

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Catherine Mack, Debtor

Case No. 25-01329-JAW  
CHAPTER 13

**NOTICE OF FILING CHAPTER 13 PLAN AND MOTIONS FOR VALUATION AND  
LIEN AVOIDANCE**

The above-named Debtor has filed a *Chapter 13 plan and Motions for Valuation and Lien Avoidance* (the “Plan”) with the Bankruptcy Court in the above referenced case (see attachment).

Any objection to confirmation of the Plan or the motions contained therein shall be filed in writing with the Clerk of Court at Thad Cochran U.S. Courthouse 501 E. Court Street Suite 2.300 Jackson, MS 39201 on or before July 15, 2025. Copies of the objection must be served on the Trustee, US Trustee, Debtor, and Attorney for Debtor.

Objections to confirmation will be heard and confirmation determined on July 21, 2025 at 10:00 AM in the Thad Cochran U.S. Courthouse, Bankruptcy Courtroom 4C, 501 East Court Street, Jackson, MS 39201, unless the court orders otherwise. If no objection is timely filed, the Plan may be confirmed without a hearing.

Date: June 4, 2025

/s/ Thomas C. Rollins, Jr.  
*Thomas C. Rollins, Jr., Attorney for Debtor*

Thomas C. Rollins, Jr., MSB# 103469  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
trollins@therollinsfirm.com  
601-500-5533

**Fill in this information to identify your case:**

Debtor 1 **Catherine Mack**  
Full Name (First, Middle, Last)

Debtor 2  
(Spouse, if filing) Full Name (First, Middle, Last)

United States Bankruptcy Court for the **SOUTHERN DISTRICT OF MISSISSIPPI**

Case number:  
(If known)

☐ Check if this is an amended plan, and list below the sections of the plan that have been changed.

**Chapter 13 Plan and Motions for Valuation and Lien Avoidance**

12/17

**Part 1: Notices**

**To Debtors:** This form sets out options that may be appropriate in some cases, but the presence of an option on the form does not indicate that the option is appropriate in your circumstances or that it is permissible in your judicial district. Plans that do not comply with local rules and judicial rulings may not be confirmable. The treatment of ALL secured and priority debts must be provided for in this plan.

In the following notice to creditors, you must check each box that applies

**To Creditors:** Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated.

You should read this plan carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

**If you oppose the plan's treatment of your claim or any provision of this plan, you or your attorney must file an objection to confirmation on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I). The Bankruptcy Court may confirm this plan without further notice if no objection to confirmation is filed. See Bankruptcy Rule 3015.**

The plan does not allow claims. Creditors must file a proof of claim to be paid under any plan that may be confirmed.

The following matters may be of particular importance. **Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked, the provision will be ineffective if set out later in the plan.**

1.1	A limit on the amount of a secured claim, set out in Section 3.2, which may result in a partial payment or no payment at all to the secured creditor	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.2	Avoidance of a judicial lien or nonpossessory, nonpurchase-money security interest, set out in Section 3.4.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.3	Nonstandard provisions, set out in Part 8.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included

**Part 2: Plan Payments and Length of Plan****2.1 Length of Plan.**

The plan period shall be for a period of 60 months, not to be less than 36 months or less than 60 months for above median income debtor(s). If fewer than 60 months of payments are specified, additional monthly payments will be made to the extent necessary to make the payments to creditors specified in this plan.

**2.2 Debtor(s) will make payments to the trustee as follows:**

Debtor shall pay \$485.00 (☐ monthly, ☐ semi-monthly, ☒ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the debtor's employer at the following address:

Kroger  
1014 Vine Street  
Cincinnati OH 45202-0000

Debtor Catherine Mack Case number \_\_\_\_\_

Joint Debtor shall pay \_\_\_\_ (☐ monthly, ☐ semi-monthly, ☐ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the joint debtor's employer at the following address:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 2.3 Income tax returns/refunds.

Check all that apply

- ☒ Debtor(s) will retain any exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will supply the trustee with a copy of each income tax return filed during the plan term within 14 days of filing the return and will turn over to the trustee all non-exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will treat income refunds as follows:

\_\_\_\_\_

### 2.4 Additional payments.

Check one.

- ☒ **None.** If "None" is checked, the rest of § 2.4 need not be completed or reproduced.

### Part 3: Treatment of Secured Claims

#### 3.1 Mortgages. (Except mortgages to be crammed down under 11 U.S.C. § 1322(c)(2) and identified in § 3.2 herein.).

Check all that apply.

- ☐ **None.** If "None" is checked, the rest of § 3.1 need not be completed or reproduced.

**3.1(a) Principal Residence Mortgages:** All long term secured debt which is to be maintained and cured under the plan pursuant to 11 U.S.C. § 1322(b)(5) shall be scheduled below. Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor, subject to the start date for the continuing monthly mortgage payment proposed herein.

**1** Mtg pmts to Trustmark  
Beginning June 2025 @ \$1,720.00 ☒ Plan ☐ Direct. Includes escrow ☒ Yes ☐ No

**1** Mtg arrears to Trustmark Through May 2025 \$5,160.00

**3.1(b)** ☐ **Non-Principal Residence Mortgages:** All long term secured debt which is to be maintained and cured under the plan pursuant to 11 U.S.C. § 1322(b)(5) shall be scheduled below. Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor, subject to the start date for the continuing monthly mortgage payment proposed herein.

Property **-NONE-**  
address: \_\_\_\_\_

Mtg pmts to \_\_\_\_\_  
Beginning month @ \_\_\_\_\_ Plan Direct. Includes escrow Yes No

Property **-NONE-** Mtg arrears to \_\_\_\_\_ Through \_\_\_\_\_

**3.1(c)** ☐ **Mortgage claims to be paid in full over the plan term:** Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor.

Creditor: **-NONE-** Approx. amt. due: \_\_\_\_\_ Int. Rate\*: \_\_\_\_\_

Property Address: \_\_\_\_\_

Principal Balance to be paid with interest at the rate above: \_\_\_\_\_  
(as stated in Part 2 of the Mortgage Proof of Claim Attachment)

Portion of claim to be paid without interest: \$ \_\_\_\_\_  
(Equal to Total Debt less Principal Balance)

Special claim for taxes/insurance: \$ -NONE- /month, beginning month .  
(as stated in Part 4 of the Mortgage Proof of Claim Attachment)

Debtor Catherine Mack Case number \_\_\_\_\_

\* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District  
Insert additional claims as needed.

**3.2 Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims. Check one..**

☒ **None.** If "None" is checked, the rest of § 3.2 need not be completed or reproduced.

**3.3 Secured claims excluded from 11 U.S.C. § 506.**

Check one.

☒ **None.** If "None" is checked, the rest of § 3.3 need not be completed or reproduced.

**3.4 Motion to avoid lien pursuant to 11 U.S.C. § 522.**

Check one.

☒ **None.** If "None" is checked, the rest of § 3.4 need not be completed or reproduced.

**3.5 Surrender of collateral.**

Check one.

☐ **None.** If "None" is checked, the rest of § 3.5 need not be completed or reproduced.

☒ The debtor(s) elect to surrender to each creditor listed below the collateral that secures the creditor's claim. The debtor(s) request that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and that the stay under § 1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 5 below.

	Name of Creditor	Collateral
Tower Loan	PMSI Furniture	

Insert additional claims as needed.

**Part 4: Treatment of Fees and Priority Claims**

**4.1 General**

Trustee's fees and all allowed priority claims, including domestic support obligations other than those treated in § 4.5, will be paid in full without postpetition interest.

**4.2 Trustee's fees**

Trustee's fees are governed by statute and may change during the course of the case.

**4.3 Attorney's fees.**

☒ No look fee: 4,600.00

Total attorney fee charged: \$4,600.00

Attorney fee previously paid: \$272.00

Attorney fee to be paid in plan per confirmation order: \$4,328.00

☐ Hourly fee: \$\_\_\_\_. (Subject to approval of Fee Application.)

**4.4 Priority claims other than attorney's fees and those treated in § 4.5.**

Check one.

☐ **None.** If "None" is checked, the rest of § 4.4 need not be completed or reproduced.

☒ Internal Revenue Service \$780.00

☐ Mississippi Dept. of Revenue \$0.00

☐ Other \$0.00

Debtor Catherine Mack Case number \_\_\_\_\_

**4.5 Domestic support obligations.**

☒ **None.** If "None" is checked, the rest of § 4.5 need not be completed or reproduced.

**Part 5: Treatment of Nonpriority Unsecured Claims**

**5.1 Nonpriority unsecured claims not separately classified.**

Allowed nonpriority unsecured claims that are not separately classified will be paid, pro rata. If more than one option is checked, the option providing the largest payment will be effective. *Check all that apply.*

- ☐ The sum of \$ \_\_\_\_\_
- ☒ 0.00 % of the total amount of these claims, an estimated payment of \$ 0.00
- ☒ The funds remaining after disbursements have been made to all other creditors provided for in this plan.

If the estate of the debtor(s) were liquidated under chapter 7, nonpriority unsecured claims would be paid approximately \$0.00.  
Regardless of the options checked above, payments on allowed nonpriority unsecured claims will be made in at least this amount.

**5.2 Other separately classified nonpriority unsecured claims (special claimants). Check one.**

☒ **None.** If "None" is checked, the rest of § 5.3 need not be completed or reproduced.

**Part 6: Executory Contracts and Unexpired Leases**

**6.1 The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory contracts and unexpired leases are rejected. Check one.**

☒ **None.** If "None" is checked, the rest of § 6.1 need not be completed or reproduced.

**Part 7: Vesting of Property of the Estate**

**7.1 Property of the estate will vest in the debtor(s) upon entry of discharge.**

**Part 8: Nonstandard Plan Provisions**

**8.1 Check "None" or List Nonstandard Plan Provisions**

☒ **None.** If "None" is checked, the rest of Part 8 need not be completed or reproduced.

**Part 9: Signatures:**

**9.1 Signatures of Debtor(s) and Debtor(s)' Attorney**

*The Debtor(s) and attorney for the Debtor(s), if any, must sign below. If the Debtor(s) do not have an attorney, the Debtor(s) must provide their complete address and telephone number.*

X /s/ Catherine Mack  
**Catherine Mack**  
Signature of Debtor 1

X \_\_\_\_\_  
Signature of Debtor 2

Executed on May 29, 2025

Executed on \_\_\_\_\_

1421 Woodfield Dr  
Address  
Jackson MS 39211-2030  
City, State, and Zip Code

\_\_\_\_\_  
Address  
\_\_\_\_\_  
City, State, and Zip Code

\_\_\_\_\_  
Telephone Number

\_\_\_\_\_  
Telephone Number

Debtor	<u>Catherine Mack</u>	Case number	
X	<u>/s/ Thomas C. Rollins, Jr.</u>	Date	<u>May 29, 2025</u>
	<u>Thomas C. Rollins, Jr. 103469</u>		
	Signature of Attorney for Debtor(s)		
	<u>P.O. Box 13767</u>		
	<u>Jackson, MS 39236</u>		
	Address, City, State, and Zip Code		
	<u>601-500-5533</u>	<u>103469 MS</u>	
	Telephone Number	MS Bar Number	
	<u>trollins@therollinsfirm.com</u>		
	Email Address		

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., attorney for the Debtor, do hereby certify that by filing the attached Notice and Chapter 13 Plan, I have caused the following parties to be served electronically via ECF:

Case Trustee  
Office of the US Trustee

I further certify that I have this day served a true and correct copy of the Notice and Chapter 13 Plan by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix).

Date: June 4, 2025

/s/ Thomas C. Rollins, Jr.  
*Thomas C. Rollins, Jr., Attorney for Debtor*

Thomas C. Rollins, Jr., MSB# 103469  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
trollins@therollinsfirm.com  
601-500-5533

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

CATHERINE MACK

CASE NO: 25-01329

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/4/2025, I did cause a copy of the following documents, described below,  
Notice and Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/4/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com



UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
CATHERINE MACK

CASE NO: 25-01329

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 6/4/2025, a copy of the following documents, described below,  
Notice and Plan

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/4/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 25-01329  
SOUTHERN DISTRICT OF MISSISSIPPI  
WED JUN 4 9-36-46 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
THAD COCHRAN US COURTHOUSE  
501 E COURT STREET  
SUITE 2300  
JACKSON MS 39201 5036~~

BAPTIST MEDICAL  
PO BOX 638  
PARIS TN 38242-0638

CREDIT ONE BANK  
ATTN BANKRUPTCY  
6801 CIMARRON RD  
LAS VEGAS NV 89113-2273

GASTROINTESTINAL ASSOC  
PO BOX 22668  
JACKSON MS 39225-2668

INTERNAL REVENUE SERVI  
CENTRALIZED INSOLVENCY  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVI  
CO US ATTORNEY  
501 EAST COURT ST  
STE 4430  
JACKSON MS 39201-5025

(P)LABORATORY CORPORATION OF AMERICA  
ATTN GOVERNMENT AUDITS  
PO BOX 2270  
BURLINGTON NC 27216-2270

NAVY FCU  
ATTN BANKRUPTCY  
PO BOX 3000  
MERRIFIELD VA 22119-3000

NAVIENT  
ATTN BANKRUPTCY  
PO BOX 9635  
WILKES BARRE PA 18773-9635

NAVY FCU  
ATTN BANKRUPTCY  
PO BOX 3302  
MERRIFIELD VA 22119-3302

(P)TOWER LOAN  
P O BOX 320001  
FLOWOOD MS 39232-0001

TRANSWORD SYSTEM INC  
2135 E PRIMROSE  
STE Q  
SPRINGFIELD MO 65804-4598

(P)TRUSTMARK NATIONAL BANK  
P O BOX 1928  
BRANDON MS 39043-1928

~~EXCLUDE~~

~~(D) (P) TRUSTMARK NATIONAL BANK  
P O BOX 1928  
BRANDON MS 39043 1928~~

US DEPARTMENT OF HUD  
77 FORSYTH STREET SW  
ATLANTA GA 30303-3490

US ATTORNEY GENERAL  
US DEPT OF JUSTICE  
950 PENNSYLVANIA AVENW  
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE  
501 EAST COURT STREET  
SUITE 6 430  
JACKSON MS 39201 5022~~

## DEBTOR

CATHERINE MACK  
1421 WOODFIELD DR  
JACKSON MS 39211-2030

~~EXCLUDE~~

~~HAROLD J BARKLEY JR  
PO BOX 4476  
JACKSON MS 39296 4476~~

THOMAS CARL ROLLINS JR  
THE ROLLINS LAW FIRM PLLC  
PO BOX 13767  
JACKSON MS 39236-3767